

The authors of RM-10807 suggest that their proposal for restructuring the current Amateur Radio Service licensing system would reduce the complexity of the system. Yet their proposal seems to enact an equally complex and burdensome licensing system. It also seems clear that the logic behind their proposal is somewhat flawed as they combine written and Morse code examination credit into a combined assessment of a licensee's ability to successfully and correctly operate a station in the Amateur Radio Service. Clearly, Morse Code is a fine mode of operations which serves the Amateur community well. However, knowledge of Morse Code is in no way equivalent to or more desirable than knowledge of regulations, good practices and theory. The Service may well benefit by requiring greater technical and regulatory knowledge from examinees. But there is no benefit from requiring testing in a specific mode of operations, especially a mode that has been declared obsolete by other wireless communications services. In the final analysis, it seems this petition, RM-10807, presents a rather creative political compromise rather than a useful restructuring of the licensing system. I believe the regulation changes proposed in RM-10807 would be extremely confusing and burdensome for the VECs with little benefit to new or existing licensees in the Amateur Radio Service. The changes to regulations proposed in petition RM-10807 should not be approved.